Table 2-3
Summary of Rail Strategy Impacts

Rail Strategy Evaluation Factor	RS 1	RS 2	RS 3
Engineering Difficulty	NA	Low	Low
Displacements	0 acres	45 acres	340 acres
	0 residences	0 residences	74 residences
	0 businesses	13 businesses	76 businesses
Cultural Resources	No effect	No effect	No effect
Community Cohesion	Negative	Neutral to Positive	Neutral to Positive
Environmental Justice	Denial of benefits an issue	No disproportionate effect	No disproportionate effect
Noise	35 residences	01	O ²
Air Quality	No EPA standard exceeded due to terminal ops.	No EPA standard exceeded due to terminal ops.	No EPA standard exceeded due to terminal ops.
		Regional offset 9%	Regional offset 54%

Source: The Corradino Group of Michigan, Inc.

2.3.1 Engineering Difficulty

Rail Strategy 1 will involve no federal investment and, while state government may be involved in rail improvements, this will be largely a private sector effort. Little will be done to physically improve the relationship between the surrounding area and the terminal. While intermodal truck operations in the area will grow from about 2,000 trucks a day to over 7,300 in 2025, no major improvements will be made to the surrounding roadways. The terminal itself will remain

unpaved and it is unlikely that a sound attenuation wall will be built. There are no engineering difficulties associated with this No-Action strategy.

Under Rail Strategy 2, land acquisition would be about 45 acres near the Michigan Central Depot to accommodate the activity around Gate A. The terminal surface would be paved. This would involve relocating rail lines, removing existing "humps" in the yard, and establishing the proper drainage, paving and lighting. Developing the rail terminal itself is considered a straightforward engineering effort with few difficulties expected. The structures that must be constructed are office buildings and equipment maintenance facilities. While no buffer would be developed, a sound wall is possible where need is demonstrated, based upon the noise analysis presented later.

Under Rail Strategy 3, expansion of the terminal (approximately 340 acres) would occur, mostly to the north. The terminal surface would be paved. Land acquisition and the road improvements discussed earlier would be made over time with land acquisition preceding the road improvements. A perimeter road would be added to connect Wyoming to John Kronk, and John Kronk from about Martin to Livernois would be rebuilt. The existing John Kronk Street between Wyoming and Martin would become an internal terminal road.

As with the other two alternatives, expanding the intermodal terminal is relatively straightforward with few engineering difficulties expected. A challenge will be in the cleanup of potential contamination in the area of acquisition. The goal of cleanup of any lands that would be acquired for expansion of the DIFT will be to protect human health and the environment by eliminating, reducing or controlling hazards posed by the site. It is anticipated that this goal can be met through a combination of actions similar to those used in comparable situations.

2.3.2 Displacements

For Rail Strategy 1, there would be no displacements. Rail Strategy 2 would require the acquisition of about 45 acres. This would affect no dwelling units but 13 businesses on 17 parcels of land around the

Noise wall likely will be built. Otherwise 37 residential units and St. Hedwig Playfield affected.

²Noise wall likely will be built. Otherwise 53 residential units and St. Hedwig Playfield affected.

Michigan Central Depot would likely be acquired. This is higher than thought earlier as potential acquisition around the MCD has been added.

Rail Strategy 3 does not include the area around the MCD and focuses expansion largely to the north of John Kronk with some expansion south. Acquisition of this area would include a parcel defined by John Kronk, Cabot, Trenton, and a line south of and parallel to St. John's Avenue, and would involve 74 dwelling units (56 single-family and 18 multi-family) (Figure 2-8). Seventy-six active businesses would likely be affected by acquisition of 52 parcels of land in RS 3. It is noteworthy this acquisition program is at least five years away and could take 10 or more years to complete after it begins.

2.3.3 Cultural Resources

Acquisition of property for terminal expansion will involve no parks. Likewise, terminal expansion is not expected to affect structures of historic significance. Archaeological potential for the area involves pre-sanitary sewer, first-generation development dating back to about 1875. If the terminal were to be expanded, field work including digging, would be undertaken in consultation with the Michigan State Historic Preservation Officer.

2.3.4 Community Cohesion

The most significant negative effect on community cohesion is likely to occur with Rail Strategy 1. DIFT truck traffic would increase from about 2,000 vehicles today to more than 7,300 in 2025 with no improvements to the roadways. No sound walls, buffers, nor grade separations of Lonyo and Central with the rail yard would happen. The rail yard surface would not be paved. The intrusion into the neighborhood of dust, and noise from locomotive horns blowing as they cross Lonyo and Central will continue.

Rail Strategy 2 does not include a buffer but a sound wall may be required based on the noise analysis discussed later. The surface of the terminal would be paved. Lonyo and Central could be separated

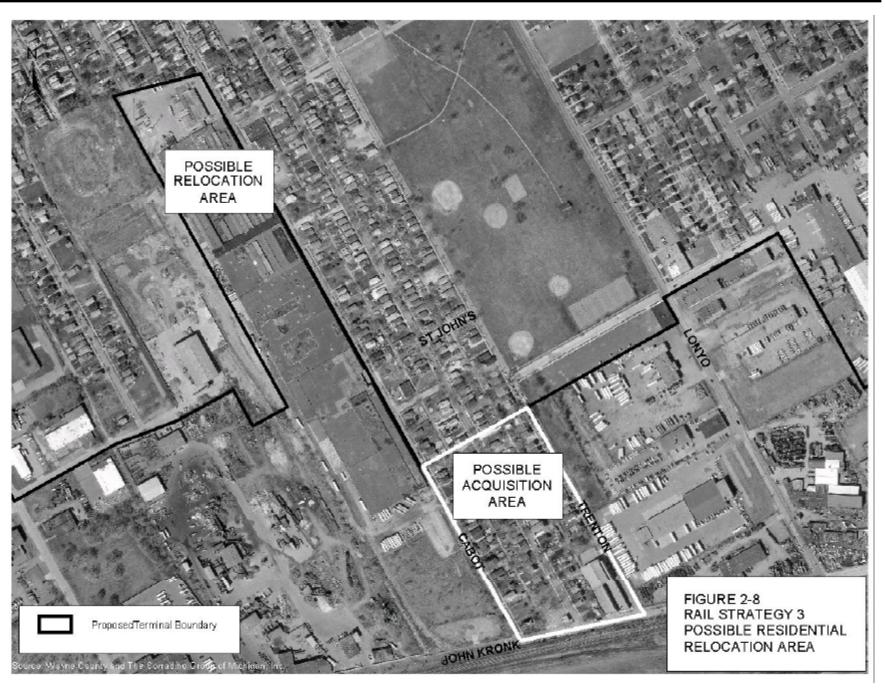
from the railroad lines if it were cost effective. More is said later. If these improvements were made, along with the truck-only road (TOR), the project would be more compatible with southwest Detroit/east Dearborn.

Rail Strategy 3 would further improve the relationship with the community by developing a buffer on its northern edge. It, like Rail Strategy 2, would involve paving the terminal's surface. Lonyo and Central are expected to be separated from the rail lines. The truckonly road would accommodate all DIFT trucks using 1-75 further relieving traffic on streets like Livernois and Dragoon. Rail Strategy 3 would likely involve acquisition of about 56 single-family and 18 multifamily dwelling units. While a number of those displaced would relocate outside the area, it is possible, through cooperation among federal and state governments as well as local, not-for-profit housing organizations, that a number of the displaced homeowners could reestablish their residences immediately adjacent to the area in which they now live (Figure 2-8). It is stressed that such a program is dependent upon the individual relocatee's decision to remain in the community. Federal and state governments will not construct such housing. That can only be done through a housing development organization which will need a reasonable market in order to proceed. So, a significant number of the relocatees would need to make this choice.

Based on these characteristics, it is the judgment of the consultant that Rail Strategies 2 and 3 do not involve an overall negative effect on the surrounding community.

2.3.5 Environmental Justice

The characteristics discussed above, plus the air quality and noise analyses disucssed next, lead the consultant to a conclusion that Rail Strategies 2 and 3 will not have a disproportionately negative effect in the area of environmental justice. A reasonableness check of this conclusion, and the earlier one on community cohesion, is reflected in Chicago in the area around CSX's 59th Street Intermodal Terminal



(Figure 2-9) and the Corwith Terminal (Figure 2-10). For years the 59th Street Terminal was an unused ConRail facility. It was a nuisance in a predominantly African-American community. Then in 1998 CSX took over the property and converted it to an intermodal facility and the community has benefited. It is noted that values of residential property around the 59th Street terminal have increased significantly since 1998. And, the residential property values at the Corwith Terminal, as in a Chicago neighborhood, have also seen regular increases over the last 15 years for which data were collected (Figures 2-11 and 2-12).

2.3.6 Noise

Rail noise at a terminal is a function of the locomotive noise and rail car wheel noise. Horn noise is also a concern as long as Lonyo and Central are not grade separated from the rail line. Mitigation of the terminal noise can take the form of berms or walls and improving trackage and reducing rail joints. Nighttime noise can be mitigated, at least partially, by locating the activities at that time towards the center and the south side of the terminal.

The most significant rail noise impact is associated with Rail Strategy 3 which would affect about 53 residential units in the adjoining area north of the terminal between Martin and Junction. A portion of the St. Hedwig playfield falls within this noise footprint. Exact mitigation of this impact will be defined through more detailed analyses, if the project goes forward. Mitigation usually takes the form of a sound-attenuation wall.

Rail Strategy 2 is expected to be associated with a lesser impact, i.e., 37 residential units as well as the St. Hedwig playfield. Again, mitigation of unwanted noise on residential buildings is appropriate and with government assistance is more likely to occur.

Finally, Rail Strategy 1 would impact almost as many residential units (35) as RS 2 as well as the playfield. However, under this alternative no sound-attenuation wall is likely to be constructed as rail activity will

be the domain of the private sector which, in its 150 years in the area, has not chosen to construct a sound wall even when train activity was as high or higher than it is forecast to grow to over the next 25 years.

2.3.7 Air Quality

Both an <u>airshed</u> (i.e., local) analysis and a <u>regional</u> analysis are conducted for this evaluation factor. The <u>airshed</u> analysis translates a pollutant "burden" produced at the terminal into <u>concentrations</u> near the site and at nearby stations that regularly monitor air quality. Rail, truck, crane/sideloader and regular vehicular activity is translated into an amount of pollution produced in a given day. Comparison can then be made of Rail Strategies 1, 2 and 3 to each other and to air quality standards.¹

The <u>regional</u> effect on air quality would develop from improving the capacity and efficiency of intermodal service in the Detroit area and thereby shifting some activity from roads to rail. So, within the greater Detroit area, consolidation of intermodal activity at the proposed location will reduce drayage between terminals as well as the idle time at terminals. It will also have some effect on more long-distance trips between locations in Detroit and intermodal facilities in cities like Chicago, Toledo and/or Cincinnati.

Airshed Analysis

The U.S. Environmental Protection Agency applies the National Ambient Air Quality Standards for several key pollutants like carbon monoxide (CO), nitrogen dioxide (NO $_2$), ozone (O $_3$) and particulate matter (PM-10 and PM-2.5) (Table 2-4). One or more of these pollutants is detected at air quality monitoring stations located around the Detroit-Livernois Yard. Three of those stations have been chosen because of their proximity to the rail terminal and the availability of recent and relevant data (Figure 2-13 and Table 2-5). Other data from other stations are available but are not extensive, not recent or otherwise not relevant.

To provide a reasonable comparison, the same land area is modeled for all three scenarios. Under Rail Strategies 1 and 2, those areas that are not converted to rail terminal